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STIPULATED MOTION FOR RELIEF FROM DISCOVERY DEADLINE (2:18-cv-01287-JLR) - 1

UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE

NAXOS, LLC, d/b/a Spiros Greek Restaurant,

AMERICAN FAMILY INSURANCE

COMPANY, a foreign insurer,

Plaintiff,

Defendant.

No. 2:18-cv-01287-JLR

The Honorable James L. Robart

STIPULATED MOTION FOR RELIEF FROM DISCOVERY DEADLINE

NOTED ON MOTION CALENDAR: OCTOBER 28, 2019

STIPULATION

Pursuant to LCR 7(j) and 10(g), the parties hereby stipulate and jointly request that this Court continue the deadline to complete discovery by five (5) days, from November 12, 2019 to November 19, 2019, for the limited purpose of completing two (2) depositions.

Counsel for the parties have conferred and have undertaken substantial efforts to schedule all depositions prior to the discovery deadline. The parties are agreed that relief from the discovery deadline for completion of two scheduled depositions is warranted. The parties agree that all other case deadlines will remain in place.

The parties propose scheduling depositions as follows:

KELLER ROHRBACK L.L.P.

1201 Third Avenue, Sulte 3200 Seattle, WA 98101-3052 TELEPHONE: (206) 623-1900 FACS(MILE: (206) 623-3384



1	November 14, 2019: Glenn Bangen, American Family Fed. R. Civ. P. 30(b)(6)
2	corporate designee
3	November 19, 2019: Erik Boe, American Family adjuster (fact witness)
4	IT IS SO STIPULATED.
5	KELLER ROHRBACK L.L.P.
6	$\mathcal{C}(\mathcal{C})$
7	Date: 10 (13/19 By / 1/1 4 4 5) 73 William C. Smart, WSBA #8192 Ian S. Birk, WSBA #31431
9	Jeff N. Comstock, WSBA #41575 Nathan Nanfelt, WSBA #45273
10	1201 Third Avenue, Suite 3200 Seattle, WA 98101 Tel: 206-623-1900 Fax: 206-623-3384
11	wsmart@kellerrohrback.com; ibirk@kellerrohrback.com;
12	jcomstock@kellerrohrback.com nnanfelt@kellerrohrback.com
13	Attorneys for Plaintiff
14	LETHER & ASSOCIATES, PLLC
15	Date: 10/23/19 By ////62 EN 445273
16	Thomas Lether, WSBA #18089
17	Eric Neal, WSBA #31863 1848 Westlake Avenue North, Suite 100 Seattle, WA 98109
. 18	Tel: 206-467-5444 Fax: 206-467-5544 tlether@letherlaw.com; eneal@letherlaw.com
19	Attorneys for Plaintiff
20	COLE WATHEN LEID HALL, P.C.
21	10/29/10
22	Date: 60/28/19 By Roy W. Leid, WSBA #25075
23	Jeremy L. Muth, WSBA #52055 1505 Westlake Avenue North, Suite 700
24	Seattle, WA 98109 Tel: 622-0494 Fax: 206-587-2476
25	<u>rleid@cwlhlaw.com; jmuth@cwlhlaw.com</u> Attorneys for Defendant
26	

STIPULATED MOTION FOR RELIEF FROM DISCOVERY DEADLINE (2:18-cv-01287-JLR) - 2

KELLER ROHRBACK L.L.P.

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ORDER

PURSUANT TO THE PARTIES' STIPULATION, IT IS HEREBY ORDERED:

- 1. The parties' Stipulated Motion for Relief From Discovery Deadline is HEREBY GRANTED.
 - 2. The parties may conduct depositions as above proposed.
 - 3. All other deadlines remain in place.

DATED this 29 day of October, 2019.

JAMES L. ROBART
United States District Judge

STIPULATED MOTION FOR RELIEF FROM DISCOVERY DEADLINE (2:18-cv-01287-JLR) - 3

KELLER ROHRBACK L.L.P.

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CERTIFICATE OF SERVICE

I certify that on 28th day of October, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the persons listed below:

Rory W. Leid, III, WSBA #25075
Jeremy L. Muth, WSBA #52055
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Attorneys for Defendant

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Attorneys for Plaintiff

Megan Johnston, Legal Assistant Keller Rohrback L.L.P. 1201 Third Avenue, Suite 3200 Seattle, WA 98101 (206) 623-1900

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STIPULATED MOTION FOR RELIEF FROM DISCOVERY DEADLINE (2:18-cv-01287-JLR) - 4

KELLER ROHRBACK L.L.P.

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